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Marie Riley

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WASTE MANAGEMENT BRANCH

ICF TECHNOLOGY

April 30, 1987

Ms. Elizabeth Thutt, P.E.
Project Engineer
Hazard Management Specialists
133 SW Second Ave.
Portland, Oregon 97204

USEPA RCRA
3058131

Dear Ms. Thutt:

This letter is to inform you that the Permits and State Programs Division (PSPD) has completed its review of Ridgefield Brick and Tile's sampling plan submitted to the Agency on March 13, 1987.

We believe that the composition of the waste disposed at the Ridgefield Brick and Tile site may be extremely variable due to the fact that the site contains waste from many different sources (including municipal waste). In cases where we are uncertain of the petitioned waste's homogeneity, we request the petitioner to collect and analyze a larger number of samples in order to sufficiently characterize the variation in constituent concentrations. We, therefore, request that you use the following sampling and analysis plan.

Samples should be collected by dividing the landfill cell into four quadrants of approximately equal volume, measuring 180 x 45 feet. Each quadrant should be further divided into five subdivisions of approximately equal volume (e.g., drawing parallel lines perpendicular distances of 80.5, 114, 139, and 161 feet from the western edge of the cell). At least two random core samples should be collected and composited from each subdivision. Do not composit cores from different subdivisions.

EP leachate analyses 1/ and total constituent analyses (acid digestion) run for each of the EP toxic metals, nickel, cyanide (using distilled water for the EP cyanide analysis), analyses for total oil and grease content, and total constituent analyses for the appropriate organic compounds on a minimum of twenty representative samples must be performed. If the

1/ If the total oil and grease content exceeds one percent, then the EP Oily Waste methodology should be used in the toxicity analyses.

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total cyanide concentration exceeds 250 ppm in any sample, the amount of reactive cyanide must be determined for the sample as well. The samples must also be analyzed for total sulfide. If the total sulfide concentration exceeds 500 ppm in any sample, the amount of reactive sulfide must also be determined.

The waste largely consists of incinerator ash from wood preserving processes that use creosote and/or pentachlorophenol, therefore, all analyses for organic compounds should include polychlorinated dibenzo-p-dioxins and furans,1/ chlorinated and non-chlorinated phenolic compounds,2/ and polynuclear aromatic hydrocarbons.3/ In addition, because the waste site also contains municipal trash, all samples should be analyzed for the presence of any Appendix VIII hazardous constituents. The analyses for all of the Appendix VIII hazardous constituents is necessary due to the inability of Ridgefield Brick and Tile to document the constituents contained in the municipal wastes disposed at the site.

The information in the sampling plan and the ground-water monitoring report as presented, indicates that no ground-water monitoring wells have been installed. In order for the waste in the landfill cell to be delisted, at least four quarters of ground-water monitoring data, obtained from a monitoring system considered by the State as adequate under 40 CFR 265, Subpart F is required. Analyses of cell leachate, toe drain, and local water wells does not alleviate the requirement for an adequate ground-water monitoring system and four quarters of ground-water monitoring data.

In addition, a complete delisting petition must include all of the information required as listed in 40 CFR 260.22. Specifically, the following information must be provided:

1) The names and professional qualifications of those

1/ Tetra-, penta-, hexa-, hepta-, and octachlorodibenzo-p-dioxins, as well as tetra-, penta-, hexa-, hepta-, and octochlorodibenzofurans.

2/ Mono-, di-, tri-, tetra-, and pentachlorophenols, as well as p-chloro-m-cresol, 2,4-dimethylphenol, and 2,4-dinitrophenol.

3/ Acenaphthene, acenaphthylene, anthracene, benz[c]acridine, benz[a]anthracene, benzo[b]fluoranthene, benzo[j]fluoranthene, benzo[k]fluoranthene, benzo[ghi]perylene, benzo[a]pyrene, carbazole, chrysene, dibenz[a,c]anthracene, dibenz[a,h]anthracene, dibenz[a,j]anthracene, dibenzo[a,e]pyrene, dibenzo[a,h]pyrene, dibenzo[a,i]pyrene, dibenzo[a,l]pyrene, fluoranthene, fluorene, indeno[1,2,3-cd]pyrene, 2-methylfluoranthene, 3-methylfluoranthene, naphthalene, phenanthrene, and pyrene.

personnel conducting the sampling and analysis of the waste petitioned for delisting (a brief resume will suffice);

2) The names and model numbers of the equipment used in the sampling and analysis of the petitioned waste;

3) At least one EP toxicity test (or Oily Waste EP toxicity test, if used) run for the EP metals, nickel, and cyanide on the waste, using the methods of standard additions. All spike concentrations and recovery results should be provided;

4) A description and schematic of the waste cell sampling plan;

5) Sample extraction, preparation, and preservation techniques, and descriptions of all testing and analysis methods, and equipment used;

6) An explicit statement and rationale, verifying that the number of samples collected and analyzed is representative of any variation in constituent concentrations over time;

7) Data indicating that the representative samples were tested for ignitability, reactivity, and corrosivity as outlined in subpart C 261.21-23;

8) A statement indicating whether the landfil is currently facing any enforcement action. If any enforcement action is underway, describe the nature of the action, including the names of representatives of the regulatory body pressing the action; and,

9) A signed certification under penalty of law as to the truth, accuracy, and completeness of the submitted information.

Should Ridgefield Brick and Tile desire to submit a formal delisting petition, the Agency will assign a new petition identification number to the petition. If you have any questions regarding our recommended sampling and analysis plan or the ground-water monitoring requirements please call me at (202) 862-7278 or Mr. Scott Maid, of PSPD, at (202) 382-4783.

Sincerely yours,

Howard Finkel
Lead Environmental Scientist

cc: Scott Maid